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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
METRO-GOLDWYN-MAYER STUDIOS INC.,	:
	:
Plaintiff,	: 07 Civ. 2918 (DAB)
	:
- against -	: (ECF Case)
	:
TPS GESTION, S.A., TPS SOCIÉTÉ EN NOM	: NOTICE OF MOTION
COLLECTIF, CANAL+ FRANCE S.A., and	:
GROUPE CANAL+ S.A.,	:
	:
Defendants.	:
-----X	

PLEASE TAKE NOTICE that upon the complaint, the annexed affidavit of Lauren Reiter Brody, sworn to June 8, 2007, and the declarations of Jean-François Meaudre, Bertrand Meheut, and Bertrand Meheut, all dated June 7, 2007, the undersigned will move this Court, in accordance with the Local Civil Rules of this District, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order, pursuant to Rules 12(b)(2) and 12(b)(6), Fed. R. Civ. P., dismissing plaintiff's complaint, and each of the claims asserted therein, on the grounds that (i) there is no personal jurisdiction over defendants TPS Gestion, S.A., Canal+ France S.A., and Groupe Canal+ S.A., and (ii) the complaint fails to state a claim upon which relief can be granted; and granting such other relief as is just and proper.

June 8, 2007

MANATT, PHELPS & PHILLIPS, LLP

By: s/Lauren Reiter Brody  
Lauren Reiter Brody (LB 4151)

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